

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Joseph Schumann,

Court File No. 14-0865 (MJD/HB)

Plaintiff,

v.

G4S Secure Solutions (USA) Inc.,
d/b/a G4S Regulated Security Solutions,

Defendant.

DECLARATION OF BARBARA J. FELT

I, Barbara J. Felt, state and declare as follows:

1. I am an attorney with the law firm HALUNEN LAW. I am one of the attorneys representing Joseph Schumann, the Plaintiff in the above-captioned matter.

2. I submit this Declaration in support of Plaintiff's Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment.

3. Attached to this Declaration are true and correct copies of the following exhibits:

Exhibit 1: Transcript of the deposition of Bruce William Walker, taken on August 6, 2015.

Exhibit 2: 06/16/05 Developmental Coaching/Counseling Form for Schumann, Bates Nos. G4S (Schumann) 000054-55.

- Exhibit 3:** 11/03/05 Developmental Coaching/Counseling Form, Bates Nos. G4S (Schumann) 000048-49.
- Exhibit 4:** 09/02/12 Career Development Review, Strauss Depo Ex. 45, Bates Nos. G4S (Schumann) 000010-13.
- Exhibit 5:** Timeline, Schumann Depo Ex. 15, Bates Nos. JS 000309-311.
- Exhibit 6:** Correspondence to Randy Pullen with Résumé, Schumann Depo Ex. 17, Bates Nos. G4S (Schumann) 000223-226.
- Exhibit 7:** 04/21/2013 Operator Log-ins, Eggenberger Depo Ex. 34, Bates No. G4S (Xcel) 000121.
- Exhibit 8:** Timeline Title FFD, Schumann Depo Ex. 12, Bates Nos. JS 000175-176.
- Exhibit 9:** May 9, 2013 Memo from Robert Erickson to Ray Cogdell, Erickson Depo Ex. 42, Bates No. JS 000193.
- Exhibit 10:** Mancuso Termination Documents, Bates Nos. G4S (Schumann) 000685-688; and JS 000173.
- Exhibit 11:** Kalsbeck Termination Documents, Bates Nos. G4S (Schumann) 000719-722; and JS 000171.
- Exhibit 12:** May 29, 2013 U.S. Nuclear Regulatory Commission Correspondence to Schumann, Bates Nos. JS 000181, JS 000185-189.
- Exhibit 13:** 05/09/13 Employee Termination Review, Strauss Depo Ex. 48, Bates Nos. G4S (Schumann) 000758-759.

Exhibit 14: 11/25/11 Employee Disciplinary/Corrective Action Notice, Strauss, Depo Ex. 49, Bates No. G4S (Schumann) 000108; 06/02/11 Employee Disciplinary/Corrective Action Notice, Strauss, Depo Ex. 50, Bates No. G4S (Schumann) 000110; 10/22/11 Employee Disciplinary/Corrective Action Notice, Strauss, Depo Ex. 51, Bates No. G4S (Schumann) 000109.

Exhibit 15: G4S Report of Investigation Prairie Island Nuclear Station, Bates Nos. G4S (Schumann) 000741-757.

Exhibit 16: May 6, 2013 Email from Brett Burris to Gene Kuyrkendall, Burris Depo Ex. 31, Bates No. G4S (Schumann) 001472.

Exhibit 17: April 29, 2013 Email from Robert Erickson to Gene Kuyrkendall, Burris Depo Ex. 32, Bates No. G4S (Schumann) 001464; and Schumann Employee Termination Review, Bates Nos. 001465-1467.

Exhibit 18: Monticello/Prairie Island Fitness for Duty Handbook, Schumann Depo Ex. 10, Bates Nos. JS 000022-114.

Exhibit 19: February 13, 2014 United States Nuclear Regulatory Commission Correspondence to Schumann, Bates No. JS 000001-4.

Exhibit 20: February 12, 2014 United States Nuclear Regulatory Commission Correspondence to Kevin Davison, Bates Nos. G4S (Schumann) 000708-717.

Exhibit 21: 04/21/13 Xcel Energy Security Incident Report Forms, Bates Nos. G4S (Schumann) 000694-707.

Exhibit 22: 04/21/13 Xcel Energy Security Incident Report Forms, Strauss Depo Ex. 46.

Exhibit 23: May 9, 2013 Memo from Robert Erickson to Ray Cogdell, Subject: Joseph Schumann, Erickson Depo Ex. 42, Bates No. JS 000193.

Exhibit 24: Meeting with Randy Cleveland & Pat Hocke, Rudawski Depo Ex. 36, Bates No. JS 000177.

Exhibit 25: G4S Report of Investigation Prairie Island Nuclear Station, Revision #6, Schumann Depo Ex. 8, G4S (Schumann) 000906-923.

I declare under penalty of perjury that the foregoing is, to the best of my knowledge and belief, true and correct.

Executed on October 21, 2015

s/ Barbara J. Felt
Barbara J. Felt, #228564